

**REMARKS**

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

This amendment adds, changes and/or deletes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier. Claims 13-16 are being added. Therefore, after amending the claims as set forth above, claims 1-16 are now pending in this application.

In the Office Action, claims 1-6, 10, and 11 were rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,075,628 to Schuster et al. For at least the reasons set forth herein, this rejection is respectfully traversed.

The generator 22 of Schuster et al. for generating an alternating current is directly connected to the conductor 14. The detector 27 detects the occurrence of a ground fault 24 because a closed circuit of the alternating current is formed via the ground fault 24 (See Column 3, line 53 – Column 4, line 18, Figure 1).

The Office Action appears to assert that the winding 42 of Schuster et al. corresponds to **the charged body** of the present invention as recited in the independent claims. The winding 42 just provides a filtered current to form a related magnetic field in the measuring toroid 36 for counterbalancing a magnetic field representative of the direct current flowing in the conductor 14 so as to detect only the alternating current. The voltage measurement unit 29 measures a current flowing in the electrical wire 14. However, the current is not induced by **the “charged body”** (compensation winding) 42 (See column 3, line 53 – column 4, line 11).

Thus, Schuster et al. fail to disclose, teach or suggest the claimed invention, specifically, an apparatus for inspecting the insulation of a motor

comprising: a **charged body** which is arranged near an electrical wire for supplying a power to the motor, **the charged body** being electrically insulated from the electrical wire; and a voltage measurement unit measuring an electromotive force induced in the electrical wire by the charged body. The generator 22 of Schuster et al. is connected with the conductor 14 and is not electrically insulated therefrom.

The Office Action also alleges that the voltage processing and measuring unit 44 of Schuster et al. is connected to the measurement winding 40 for measuring the electromotive force induced in the electrical wire 14 by the charged body current generator 22. The detector 27, including the voltage processing and measuring unit 44, detects a current induced in the wiring 40 representative of the alternating current generated by the generator 22 that is directly connected to the conductor 14, as mentioned above. Accordingly, Schuster et al. cannot be deemed to disclose, teach or suggest a voltage measuring unit measuring an electromotive force induced in the electrical wire by the charged body which is electrically insulated from the electrical wire. Schuster et al. discloses just the circuit of the current detector 44 in which the pick up sensor detects induced current for measuring a current signal in the conductor 14.

As mentioned above, and in contrast to Schuster et al., in the present invention as defined by the independent claims of the present application, the charged body is insulated from the electrical wire and the charged body generates an induced electromotive force in the electrical wire. In contrast, the generator 22 of Schuster et al. is directly connected to the conductor 14 and thus the generator 22 does **not** generate an induced electromotive force in the electrical wire. In view of the foregoing, the rejection under 35 U.S.C. § 102(b) should be reconsidered and withdrawn.

The Office Action further rejects claims 7-9 and 12 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Schuster et al. in view of U.S. Patent No. 6,452,416 to Kaneda et al. For the reasons set forth above with

respect to Schuster et al, this rejection should be reconsidered and withdrawn. For the additional reasons set forth herein, this rejection is traversed.

The abnormality detecting apparatus for a rotating electric machine of Kaneda et al. is very different from the present invention and the apparatus of Schuster et al. The present invention cannot be made by just employing the relay switching unit of Kaneda et al. in the insulation monitoring system of Schuster by sequentially switching individual motors for connection with the detector unit of Schuster et al. No prima facie case of obviousness has been made. Further there has not been shown to be any motivation in any of the cited references to combine the insulation monitoring system of Schuster et al. with the relay switching unit of Kaneda et al. to attempt to make the present invention. In view of the foregoing, the rejection under 35 U.S.C. § 103(a) should be reconsidered and withdrawn.

Claims 13-16 have been newly added to further define the invention and are supported at, for example, page 6, lines 10-13 of the present specification.

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

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Date

Respectfully submitted,



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